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June 29, 2020

Honorable William H. Pauley, III
United States District Judge
500 Pearl Street
New York, New York 10007

Application granted. Sentencing
adjourned to October 9, 2020 at
11:00 a.m.

SO ORDERED:



WILLIAM H. PAULEY III
U.S.D.J.

Re: United States v. Sanchez, et al., 19 Cr. 820
(WHP)

June 29, 2020

Dear Judge Pauley:

I write with the consent from the Government to respectfully request that sentencing in the above-entitled case currently scheduled for July 16, 2020 be continued to a date in early October 2020.

As of this date, due to the Covid 19- Pandemic, undersigned counsel has been limited in her ability to meet with Mr. Sanchez and to obtain mitigating documentation concerning Mr. Sanchez's upcoming sentencing and to properly address issues raised in the PSR. Furthermore, as of this date federal jails including the MDC, where Mr. Sanchez was incarcerated continue to be in lock down status in response to the Covid-19 pandemic. As of today, the BOP website indicates that there are 5 inmates and 6 staff members positive for Covid-19 at the MDC. The dangerous conditions at the MDC and other local jails persist. By now it almost goes without saying that we should not be adding to the prison population during the COVID-19 pandemic if it can be avoided. Several recent court rulings have explained the health risks—to inmates, guards, and the community at large—created by large prison populations. See, e.g., *United States v. Stephens*, No. 15-cr-95-AJN, 2020 WL 1295155, at *2 (S.D.N.Y. Mar. 19, 2020); *United States v. Barkman*, No. 3:19-cr-0052-RCJ, 2020 U.S. Dist. LEXIS 45628 (D. Nev. Mar. 17, 2020); *In the Matter of Extradition of Toledo Manrique*, No. 3:19-mj-71055-MAG-1 (TSH), 2020 WL 1307109 (N.D. Cal. Mar. 19, 2020). Additionally,

Based on the foregoing, the government consents that the Court adjourn Mr. Sanchez's sentencing date until a date early in October of 2020 and the parties are jointly requesting that Mr. Sanchez be continued on the current terms of release as set forth in this Court's previous order dated March 30, 2020 (ECF Doc. 30) until Mr. Sanchez's sentencing date so long as he continues to be in compliance with the conditions of his pre-trial supervision.

Respectfully submitted,
/S/
Paula J. Notari

Cc: Dominic Gentile, Esq. Assistant U.S. Attorney